

Plaintiffs and Class Representatives Laborers Pension Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis and Angelica Galkin (collectively, “Plaintiffs”) respectfully move the Court to enter an Order: (i) preliminarily approving the Settlement set forth in the Stipulation and Agreement of Settlement; (ii) approving the form and manner of providing notice of the Settlement to the Class; and (iii) setting a hearing date at which the Court will consider final approval of the Settlement, approval of the Plan of Allocation, and Lead Counsel’s Fee and Expense Application.

In support of this Motion, Plaintiffs rely on the accompanying Memorandum of Law, the Stipulation and Agreement of Settlement and exhibits thereto, and the Declaration of Joseph Mahan Regarding Notice Plan. A [Proposed] Order granting the Motion is being filed herewith.

DATED: November 12, 2021

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Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, I electronically transmitted the attached Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

s/ EVAN J. KAUFMAN
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